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January 3, 1995

OUR FILE NO.  
0850-101-63

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20554

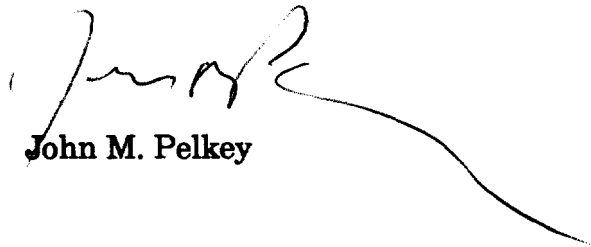
Re: MM Docket No. 94-122  
Atlantic and Glenwood, Iowa

Dear Mr. Caton:

Transmitted herewith on behalf of Valley Broadcasting, Inc., are an original and four copies of its Reply Comments in the above-referenced proceeding.

If there are any questions concerning this matter, please contact this office directly.

Very truly yours,



John M. Pelkey

JMPapp  
Enclosures

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Before The  
**Federal Communications Commission**

Washington, D.C. 20554

**KJAN - 3 1995**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In The Matter Of

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Atlantic and Glenwood, IA)

MM Docket No. 94-122  
RM-8513

**DOCKET FILE COPY ORIGINAL**

TO: Chief, Allocations Branch

**Reply Comments of  
Valley Broadcasting, Inc.**

In response to a Petition for Rulemaking filed by Valley Broadcasting, Inc. ("Valley"), the Commission issued a Notice of Proposed Rulemaking proposing to reallocate Channel 279C from Atlantic, Iowa to Glenwood, Iowa. December 19, 1994, was established as the date for the submission of Comments and January 3, 1995 was the date established for the submission of Reply Comments. Valley hereby submits its Reply Comments in the proceeding.

No Comments were received in opposition to the proposal to allocate Channel 279C to Glenwood. Valley submitted Comments in which it again stated its support for the proposal and reaffirmed its commitment to apply for Channel 279C if that channel is re-allocated to Glenwood.<sup>1</sup> Comments were also received from Wireless Communications Corp. ("Wireless"), licensee of KJAN, which is an AM station licensed to Atlantic. In those Comments, Wireless specifically stated that it "has no objection to the change in the Table of Allotments as proposed by

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<sup>1</sup> Comments of Valley Broadcasting, Inc. at 2.

Valley."<sup>2</sup> Wireless did propose, however, that the Commission, as part of the instant proceeding, allot Channel 239C3 to Atlantic.<sup>3</sup> <sup>4</sup> Wireless committed to promptly file an application for the new allotment if granted.<sup>5</sup>

As was initially demonstrated in Valley's Comments, the adoption of Valley's proposal would serve the public interest. Not only would it provide Glenwood with its first local channel, it would also permit an additional 23,397 persons to receive service from Channel 279.<sup>6</sup> Valley's Comments further pointed out that Atlantic would still retain its local aural service inasmuch as KJAN would remain licensed to Atlantic and that the loss area would continue to be served by at least 29 allocated or authorized signals that cover all or part of the loss area.<sup>7</sup> Wireless' counterproposal, if adopted, would mean that at least 30 allocated or authorized signals would cover all or part of the loss area--thus further minimizing any potentially adverse effect from the reallocation of Channel 279 to Glenwood.

Accordingly, Valley, having conclusively demonstrated that its proposal is in the public interest and no opposition having been filed

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<sup>2</sup> Comments and Counterproposal at 1.

<sup>3</sup> Comments and Counterproposal at 3-4.

<sup>4</sup> Wireless' Comments included an allocation study performed last summer by Valley's consulting engineer in which Valley demonstrated that Channel 239C3 could be allocated to Atlantic consistent with the Commission's spacing requirements. Attached hereto is an updated version of that study, which demonstrates that, as of November 25, 1994, Channel 239C3 could still be allocated to Atlantic consistent with the Commission's spacing requirements.

<sup>5</sup> Comments and Counterproposal at 4.


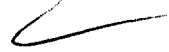
<sup>6</sup> Comments of Valley Broadcasting, Inc., at 4.

<sup>7</sup> Comments of Valley Broadcasting, Inc. at 3-4.

with respect to that proposal, respectfully submits that the proposed rulemaking should be adopted.

Respectfully submitted,

**Valley Broadcasting, Inc.**

By   
John M. Pelkey  
Ronald E. Quirk, Jr. 

Its Attorneys

HALEY BADER & POTTS P.L.C.  
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703/841-0606

January 3, 1995

**WHEELER - BROADCAST CONSULTING**  
**3718 W. 52nd Terrace - Shawnee Mission KS 66205**

Open Channel  
Atlantic, IA

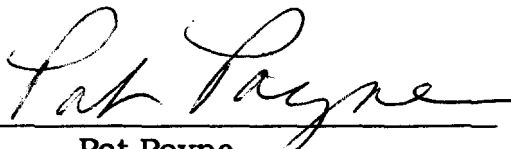
<b>REFERENCE</b>	<b>CLASS C3</b>	<b>DISPLAY DATES</b>
41 24 22 N	Current rules spacings	DATA 11-25-94
95 00 42 W	CHANNEL 239 - 95.7 MHz	SEARCH 12-29-94

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KCSI.C	237C3	Red Oak	IA	200.7	45.07	43.0	2.07 <
CPM CN	41 01 35	95 12 05	20.500 kW	111M	28.0	26.7	
	Hawkeye Communications, Inc.				BMPH921214IF		941208
>From channel 237A per D89-174							
KQWCFM	239C3	Webster City	IA	40.5	155.11	153.0	2.11 <
LI CN	42 28 04	93 47 48	25.000 kW	100M	96.4	95.1	
	Gorich Radio Corporation				BLH910522KA		
KCSI	237A	Red Oak	IA	201.3	46.42	42.0	4.42
LI CN	41 01 00	95 12 46	3.000 kW	38M	28.9	26.1	
	Hawkeye Communications, Inc.				BLH790904AF		
>*To channel 237C3 per D89-174							
KEFM	241C	Omaha	NE	249.9	108.32	96.0	12.32
LI CN	41 04 15	96 13 30	100.000 kW	439M	67.3	59.7	
	Webster Communications Compan				BLH860430KF		
KGLI	238C1	Sioux City	IA	319.0	163.20	144.0	19.20
LI CN	42 30 53	96 18 13	100.000 kW	274M	101.4	89.5	
	Cardinal Communications, Inc.				BLH6140		
AD240	240A	Sac City	IA	0.1	110.82	89.0	21.82
AD	42 24 14	95 00 32	0.000 kW	0M	68.9	55.3	
	Iowa Great Lakes Broadcasting				RM8487		940912
KAANFM	238C2	Bethany	MO	150.5	146.65	117.0	29.65
LI CN	40 15 23	94 09 23	50.000 kW	108M	91.1	72.7	
	Jerrell A. Shepherd				BLH890313KD		

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley Bader & Potts P.L.C., hereby certifies that the foregoing document was mailed this date by First-Class U.S. Mail, postage prepaid, or was hand-delivered\*, to the following:

Barry A. Friedman, Esquire  
Semmes, Bowen & Semmes  
1025 Connecticut Avenue, N.W., Suite 900  
Washington, D.C. 20036

  
Pat Payne

January 3, 1995